

The Honorable John C. Coughenour
The Honorable S. Kate Vaughan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOSE MEDINA CAMACHO, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

PEOPLECONNECT, INC., a Delaware
corporation; INTELIUS LLC, a Delaware
limited liability company; and THE
CONTROL GROUP MEDIA COMPANY,
LLC,

Defendants.

CASE NO. C21-1074-JCC-SKV

JOINT MOTION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANTS TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT

NOTE ON MOTION CALENDAR:
November 3, 2021

PeopleConnect, Inc., Intelius LLC, and The Control Group Media Company, LLC
("Defendants") and Jose Medina Camacho, on behalf of himself and all others similarly situated
("Plaintiff"), by and through their undersigned counsel, respectfully move for an extension of time
for all Defendants to answer or otherwise respond to Plaintiff's First Amended Class Action
Complaint such that all Defendants will answer or otherwise respond by December 27, 2021. In
support of this Motion, the Parties state as follows:

JOINT MOTION AND [PROPOSED] ORDER TO EXTEND
DEADLINE FOR DEFENDANTS TO ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT - 1
C21-1074-JCC-SKV

GORDON TILDEN THOMAS CORDELL	600 University Street Suite 2915 Seattle, WA 98101 206.467.6477
---------------------------------------	--

1 1. Plaintiff filed a class action complaint against PeopleConnect, Inc. and Intelius LLC
2
3 on August 11, 2021 (ECF No. 1).
4

5 2. Defendants PeopleConnect, Inc. and Intelius LLC waived service, resulting in a
6
7 current date to answer or otherwise plead of 60 days from September 30, 2021, i.e., November 29,
8
9 2021 (ECF No. 17).
10

11 3. On October 28, 2021, Plaintiff filed a First Amended Class Action Complaint
12
13 (“Complaint”), adding The Control Group Media Company, LLC as a Defendant (ECF No. 19).
14

15 4. On October 28, 2021, counsel for Defendants agreed to waive service for The
16
17 Control Group Media Company, LLC. Given that agreement, The Control Group Media Company,
18
19 LLC’s date to answer or otherwise respond to Plaintiff’s Complaint is December 27, 2021.
20

21 5. To reconcile the competing responsive dates, and in the interests of efficiency and
22
23 judicial economy, the Parties agree that the deadline for all three Defendants to answer or otherwise
24
25 respond to Plaintiff’s Complaint should be on the same date, up to and including December 27,
26
27 2021.
28

29 WHEREFORE, for the reasons stated herein, the Parties respectfully request that this Court
30
31 grant this Motion and enter an Order extending the deadline for all Defendants (PeopleConnect,
32
33 Inc., Intelius LLC, and The Control Group Media Company, LLC) to respond to Plaintiff’s
34
35 Complaint up to and including December 27, 2021.
36
37
38
39
40
41
42
43
44
45

DATED this 3rd day of November, 2021.

PEOPLECONNECT, INC., INTELIOUS
LLC, and THE CONTROL GROUP MEDIA
COMPANY, LLC

JOSE MEDINA CAMACHO

s/ Michael Rosenberger
Michael Rosenberger, WSBA #17730
600 University Street, Suite 2915
Seattle, Washington 98101
206 467-6477
mrosenberger@gordontilden.com

*Attorney for Defendants PeopleConnect,
Inc., Intelious LLC, and The Control Group
Media Company, LLC*

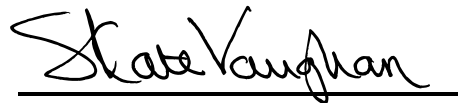
s/ Kim D. Stephens
Kim D. Stephens, P.S. (WSBA # 11984)
Cecily Jordan (WSBA # 50061)
TOUSLEY BRAIN STEPHENS
1200 Fifth Ave., Ste 1700
Seattle, WA 98101
206 682-5600
kstephens@tousley.com
cjordan@tousley.com

Ari J. Scharg (*pro hac vice*)
Benjamin H. Richman (*pro hac vice*)
Benjamin Scott Thomassen (*pro hac vice*)
EDELSON PC
350 N LaSalle St., 14th Floor
Chicago, IL 60654
312 239-3362
ascharg@edelson.com
brichman@edelson.com
bthomassen@edelson.com

Kevin Abramowicz (*pro hac vice*)
Kevin W. Tucker (*pro hac vice*)
EAST END TRIAL GROUP LLC
6901 Lynn Way, Ste 215
Pittsburgh, PA 15208
412 223-5740
kabramowicz@eastendtrialgroup.com
ktucker@eastendtrialgroup.com

Attorneys for Plaintiff Jose Medina Camacho

IT IS SO ORDERED.



S. KATE VAUGHAN
United States Magistrate Judge

DATE: 4th day of November, 2021